

Exhibit D

to June 3, 2020 Reply Letter

From: [Kim, Jane \(USANYS\) 4](#)
To: [Ted.Kim@treasury.gov](#)
Cc: [Kaveh.Miremadi@treasury.gov](#); [Lake, Stephanie \(USANYS\)](#); [MariaHelene.VanWagenberg@treasury.gov](#); [Jacqueline.Brewer@treasury.gov](#); [Krouse, Michael \(USANYS\)](#); [LynchG@dany.nyc.gov](#)
Subject: Re: Nejad trial
Date: Monday, February 3, 2020 9:31:00 AM

Great, thank you!

On Feb 3, 2020, at 9:28 AM, "[Ted.Kim@treasury.gov](#)" <[Ted.Kim@treasury.gov](#)> wrote:

Hi Jane,

Please use this conference call bridge number for today's t-con at 10am. Thanks!

Call-in Number: 202-927-2255

Participant Passcode: 826536

Ted

From: Kim, Jane (USANYS) 4 <[Jane.Kim@usdoj.gov](#)>
Sent: Sunday, January 26, 2020 2:05 PM
To: Miremadi, Kaveh <[Kaveh.Miremadi@treasury.gov](#)>
Cc: Lake, Stephanie (USANYS) <[Stephanie.Lake@usdoj.gov](#)>; Van Wagenberg, Maria-Helene <[MariaHelene.VanWagenberg@treasury.gov](#)>; Kim, Ted <[Ted.Kim@treasury.gov](#)>; Brewer, Jacqueline <[Jacqueline.Brewer@treasury.gov](#)>; Krouse, Michael (USANYS) <[Michael.Krouse@usdoj.gov](#)>; [LynchG@dany.nyc.gov](#)
Subject: Re: Nejad trial

Thank you, Kaveh. Ted, are you free tomorrow afternoon or Tuesday to talk by phone? Thanks.

On Jan 23, 2020, at 3:04 PM, "[Kaveh.Miremadi@treasury.gov](#)" <[Kaveh.Miremadi@treasury.gov](#)> wrote:

Stephanie,

Thank you for talking me through what you expect out of the OFAC witness. Senior Enforcement Officer Ted Kim has agreed to serve as your witness. He is one of our most experienced sanctions enforcement experts. Please work with him directly regarding trial prep and continue to copy me, Jacqui Brewer (Ted's supervisor), and Maria (our counsel) on your communications with him.

Ted's resume is attached.

We're looking forward to supporting your efforts.

Thanks,
Kaveh

From: Lake, Stephanie (USANYS) <Stephanie.Lake@usdoj.gov>
Sent: Wednesday, January 22, 2020 10:16 PM
To: Van Wagenberg, Maria-Helene
<MariaHelene.VanWagenberg@treasury.gov>; Kim, Jane (USANYS) 4
<Jane.Kim@usdoj.gov>; Ward, Jonathan <Jonathan.Ward@treasury.gov>
Cc: Krouse, Michael (USANYS) <Michael.Krouse@usdoj.gov>;
LynchG@dany.nyc.gov; Miremadi, Kaveh
<Kaveh.Miremadi@treasury.gov>
Subject: RE: Nejad trial

Thank you. Kaveh – are you free first thing tomorrow morning to discuss this over the phone? We're now past our deadline and may lose the ability to call a witness from OFAC at our trial. This would be very damaging to the case.

From: MariaHelene.VanWagenberg@treasury.gov
<MariaHelene.VanWagenberg@treasury.gov>
Sent: Wednesday, January 22, 2020 6:39 PM
To: Lake, Stephanie (USANYS) <SLake@usa.doj.gov>; Kim, Jane (USANYS)
4 <JKim4@usa.doj.gov>; Jonathan.Ward@treasury.gov
Cc: Krouse, Michael (USANYS) <MKrouse@usa.doj.gov>;
LynchG@dany.nyc.gov; Kaveh.Miremadi@treasury.gov
Subject: RE: Nejad trial

Hi Stephanie,

Copying Kaveh, a chief in our Enforcement division who is tracking this request. Jon has to be out of the office today for a family emergency, so I know Enforcement has been working on pinning down a replacement and sending you a resume.

From: Lake, Stephanie (USANYS) <Stephanie.Lake@usdoj.gov>
Date: January 22, 2020 at 6:14:14 PM EST
To: Van Wagenberg, Maria-Helene
<MariaHelene.VanWagenberg@treasury.gov>, Kim, Jane
(USANYS) 4 <Jane.Kim@usdoj.gov>, Ward, Jonathan
<Jonathan.Ward@treasury.gov>
Cc: Krouse, Michael (USANYS) <Michael.Krouse@usdoj.gov>,
LynchG@dany.nyc.gov <LynchG@dany.nyc.gov>

Subject: RE: Nejad trial

Hi Maria,

Just checking in on the resume. We really do need this today.

Stephanie

From: Lake, Stephanie (USANYS)
Sent: Wednesday, January 22, 2020 9:16 AM
To: MariaHelene.VanWagenberg@treasury.gov; Kim, Jane (USANYS) 4
<JKim4@usa.doj.gov>; Jonathan.Ward@treasury.gov
Cc: Krouse, Michael (USANYS) <MKrouse@usa.doj.gov>;
LynchG@dany.nyc.gov
Subject: RE: Nejad trial

Thanks Maria. Jane and Michael are traveling for the case today and tomorrow – I will let Jane weigh in on when they'll be available for a call. In the interim, can you send me the resume of whoever will be testifying as the OFAC expert? We need to include this in a disclosure that is due today.

From: MariaHelene.VanWagenberg@treasury.gov
<MariaHelene.VanWagenberg@treasury.gov>
Sent: Tuesday, January 21, 2020 4:05 PM
To: Kim, Jane (USANYS) 4 <JKim4@usa.doj.gov>;
Jonathan.Ward@treasury.gov
Cc: Lake, Stephanie (USANYS) <SLake@usa.doj.gov>; Krouse, Michael
(USANYS) <MKrouse@usa.doj.gov>; LynchG@dany.nyc.gov
Subject: RE: Nejad trial

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DECISIONAL

Apologies for the delay, as the last week has been exceedingly busy for our office. I'm free tomorrow after 4:30 pm or Thursday afternoon. Thanks and best, Maria

Maria H. van Wagenberg
Attorney-Advisor
Office of the Chief Counsel (Foreign Assets Control)
U.S. Department of the Treasury
1500 Pennsylvania Avenue, N.W.
Washington, DC 20220
Email: mariahelene.vanwagenberg@treasury.gov
Tel: 202-622-2070

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From: Kim, Jane (USANYS) 4 <Jane.Kim@usdoj.gov>
Sent: Tuesday, January 21, 2020 2:06 PM
To: Ward, Jonathan <Jonathan.Ward@treasury.gov>
Cc: Van Wagenberg, Maria-Helene
<MariaHelene.VanWagenberg@treasury.gov>; Lake, Stephanie (USANYS)
<Stephanie.Lake@usdoj.gov>; Krouse, Michael (USANYS)
<Michael.Krouse@usdoj.gov>; LynchG@dany.nyc.gov
Subject: Re: Nejad trial

Jon, checking in again. Could you please also send your CV as soon as you can? Thanks.

On Jan 15, 2020, at 2:57 PM, Kim, Jane (USANYS) 4
<JKim4@usa.doj.gov> wrote:

Jon,

Checking in to see if you and Maria are available tomorrow for a call?

Thanks,
Jane

From: Jonathan.Ward@treasury.gov
<Jonathan.Ward@treasury.gov>
Sent: Wednesday, January 8, 2020 1:38 PM
To: Kim, Jane (USANYS) 4 <JKim4@usa.doj.gov>
Cc: MariaHelene.VanWagenberg@treasury.gov
Subject: RE: Nejad trial

Appreciate your understanding. Will do.

From: Kim, Jane (USANYS) 4 <Jane.Kim@usdoj.gov>
Sent: Wednesday, January 8, 2020 1:36 PM
To: Ward, Jonathan <Jonathan.Ward@treasury.gov>
Cc: Van Wagenberg, Maria-Helene
<MariaHelene.VanWagenberg@treasury.gov>
Subject: RE: Nejad trial

Okay – let us know when you’re free. Thanks and good luck.

From: Jonathan.Ward@treasury.gov
<Jonathan.Ward@treasury.gov>
Sent: Wednesday, January 8, 2020 1:17 PM
To: Kim, Jane (USANYS) 4 <JKim4@usa.doj.gov>
Cc: MariaHelene.VanWagenberg@treasury.gov
Subject: RE: Nejad trial
Importance: High

Jane,

We would like to reschedule this call until mid / late next week due to an urgent matter which is taking to priority down here.

Thanks,
Jon

From: Kim, Jane (USANYS) 4 <Jane.Kim@usdoj.gov>
Sent: Tuesday, January 7, 2020 2:53 PM
To: Ward, Jonathan <Jonathan.Ward@treasury.gov>
Cc: Van Wagenberg, Maria-Helene
<MariaHelene.VanWagenberg@treasury.gov>
Subject: RE: Nejad trial

Either of those times work for me if they work for Maria.
Thanks.

From: Jonathan.Ward@treasury.gov
<Jonathan.Ward@treasury.gov>
Sent: Tuesday, January 7, 2020 2:29 PM
To: Kim, Jane (USANYS) 4 <JKim4@usa.doj.gov>
Cc: MariaHelene.VanWagenberg@treasury.gov
Subject: RE: Nejad trial

I have a meeting at 1400, but I could do 1330 or 1500.

-J.W.

From: Kim, Jane (USANYS) 4 <Jane.Kim@usdoj.gov>
Date: January 7, 2020 at 12:34:57 PM EST
To: Ward, Jonathan <Jonathan.Ward@treasury.gov>,

Van Wagenberg, Maria-Helene
<MariaHelene.VanWagenberg@treasury.gov>, Sultoon,
Samantha <Samantha.Sultoon@treasury.gov>
Cc: Miremadi, Kaveh <Kaveh.Miremadi@treasury.gov>
Subject: RE: Nejad trial

Would tomorrow at 2pm work? Thanks.

-----Original Message-----

From: Jonathan.Ward@treasury.gov <Jonathan.Ward@treasury.gov>
Sent: Tuesday, January 7, 2020 12:32 PM
To: Kim, Jane (USANYS) 4 <JKim4@usa.doj.gov>;
MariaHelene.VanWagenberg@treasury.gov;
Samantha.Sultoon@treasury.gov
Cc: Kaveh.Miremadi@treasury.gov
Subject: RE: Nejad trial

Jane,

OGC, Maria, would like to be on the line for this call. If we could push it until tomorrow or later this week we think that would be best.

-J.W.

<Resume Ted K 2019.10.30.pdf>